

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

ALVIN VAUGHT, NANCY VAUGHT, §
§
Plaintiffs, §
§
VS. § CASE NO. SA:17-CV-00170-OLG
§
OCWEN LOAN SERVICING, LLC, ET. §
AL. §
§
Defendant. §

**FOURTH UNOPPOSED MOTION TO EXTEND DEADLINE TO ANSWER
OR OTHERWISE RESPOND BY DEFENDANTS OCWEN LOAN SERVICING, LLC,
POWER DEFAULT SERVICES, INC., AND CHRISTIANA TRUST, A DIVISION OF
WILMINGTON SAVINGS FUND SOCIETY FSB, NOT IN ITS INDIVIDUAL
CAPACITY BUT AS TRUSTEE OF ARLP SECURITIZATION TRUST SERIES 2014-2**

Defendant Ocwen Loan Servicing, LLC (“Ocwen”), Defendant Power Default Services, Inc. (“PDS”), and Defendant Christiana Trust, a division of Wilmington Savings Fund Society FSB, not in its individual capacity but as Trustee of ARLP Securitization Trust Series 2014-2 (“Wilmington FSB”) (collectively, “Defendants”) file this Unopposed Motion to Extend Deadline to Answer or Otherwise Respond and respectfully show the Court as follows:

1. Plaintiffs filed their Original Petition and Request for Temporary Restraining Order on January 9, 2017 in Texas state court in the 451st Judicial District for Kendall County, Texas assigned Cause No. 17-010 (the “State Action”). On March 3, 2017, Defendants filed their Original Answer in the State Action. On the same day, Defendants filed a Notice of Removal removing the State Action to this Court.
2. Plaintiffs filed an Amended Complaint on August 1, 2017.

3. On August 11, 2017, Ocwen and PDS filed a Motion to Substitute Attorney and Permit Withdrawal of Counsel, which the Court granted on August 14, 2017.

4. Defendants filed their Unopposed Motion to Extend Deadline to Answer or Otherwise Respond on August 14, 2017, which the Court granted on August 16, 2017. Pursuant to the Court's order, the deadline to answer or otherwise respond was extended to September 5, 2017.

5. On September 5, 2017, Defendants filed their Second Unopposed Motion to Extend Deadline to Answer or Otherwise Respond, which the Court granted on September 6, 2017. That order extended Defendants' deadline to answer or otherwise respond up to and including September 26, 2017.

6. Because the parties entered settlement negotiations, Defendants filed their Third Unopposed Motion to Extend Deadline to Answer or Otherwise Respond on September 26, 2017, which the Court granted on September 27, 2017. That order extended Defendants' deadline to answer or otherwise respond up to and including October 17, 2017.

7. The parties are actively negotiating settlement and have exchanged a written settlement offer. In order to provide additional time for the parties to attempt to resolve this matter, Defendants respectfully request that the Court permit Defendants an additional three (3) weeks to answer or otherwise respond to Plaintiffs' Amended Complaint, making the new deadline on or before November 7, 2017.

8. Plaintiffs do not oppose the relief sought herein.

9. This Motion is not brought for purposes of delay, but so that justice may be done.

WHEREFORE, Defendants respectfully request that the Court grant this Fourth Unopposed Motion to Extend Deadline to Answer or Otherwise Respond in its entirety, and

extend the deadline for Defendants to answer or otherwise respond to the Amended Complaint to and including Tuesday, November 7, 2017.

Dated: October 16, 2017

Respectfully submitted,

/s/ Brett W. Schouest

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SERVICING, LLC AND POWER DEFAULT
SERVICES, INC.**

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**ATTORNEYS FOR DEFENDANT
CHRISTIANA TRUST, A DIVISION OF
WILMINGTON SAVINGS BANK FSB, NOT
IN ITS INDIVIDUAL CAPACITY BUT AS
TRUSTEE OF ARLP SECURITIZATION
TRUST SERIES 2014-2**

CERTIFICATE OF CONFERENCE

All counsel of record have been conferred with on October 16, 2017 and they indicated there is no opposition to this motion.

/s/ Matt D. Manning _____
Matt D. Manning

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was served upon all counsel of record on October 16, 2017 in compliance with the Federal Rules of Civil Procedure.

/s/ Brett W. Schouest _____
Brett W. Schouest